

REMARKS

Please reconsider the application in view of the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-5 and 7-10 are pending. Claim 1 is independent. The remaining claims depend, directly or indirectly, from claim 1.

Rejection(s) under 35 U.S.C. § 103

Claims 1-5

Claims 1-5 stand rejected under 35 U.S.C. § 103(a) as being anticipated by US Patent No. 6,507,872 (“Geshwind”) in view of US Pat. No. 6,697,859 (“Takahashi”). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

MPEP § 2143 states that “[t]he key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in KSR noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit.” Further, when combining prior art elements, the Examiner “must articulate the following: (1) a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference....” MPEP § 2143(A).

The claimed invention is directed to extracting and transmitting an application that is made up of several interactive pages, each interactive page having a main file and included

components. The files that make up the application are organized in a tree structure, with depth levels and links between main files. Included components necessary for forming an interactive page (e.g., applets, images, etc.) are pointed to by inclusion links. Navigation links, which are separate and distinct from inclusion links, are used to reference the main files of other interactive pages that are of different depths. *See* Specification, pages 6, 8, and 16-17.

Accordingly, the claimed invention requires, in part (i) inclusion links that point to included components necessary to form a first interactive page and facilitate display and execution of the included components; and (ii) wherein the inclusion and navigation links are identified using semantic and syntactic analysis.

On page 4 of the Action mailed January 25, 2010, the Examiner admits that Geshwind fails to disclose (i) and (ii) as recited above. However, the Examiner relies on Takahashi as disclosing the aforementioned limitations. Applicants respectfully disagree.

Takahashi is directed to transferring documents from a server to a client by prioritizing the documents and embedded objects within documents. Specifically, the cited portion of Takahashi discloses that a document A has embedded objects b and c, and a link object d, which points to page D. The data is transferred across a connection line according to priorities associated with the data. In the cited portion of Takahashi, page D is transferred before the connection breaks, because page D has the highest priority. *See* Takahashi, col. 5, ll. 40-59 and col. 2, ll. 25-29.

However, Takahashi does not disclose or render obvious both a semantic and syntactic analysis of document A. Rather, only “analysis of content” is disclosed. *See* Takahashi, col. 5, ll. 46. There is absolutely no detail provided in Takahashi as to what “analyzes the content of the data to detect the presence of embedded object b and c” entails. Moreover, no type of semantic

and syntactic content analysis is disclosed in Takahashi. Even assuming *arguendo* that one of semantic and syntactic analysis is performed to find embedded objects b and c in Takahashi, there is certainly no requirement or disclosure of performing both semantic AND syntactic analysis to find the embedded objects. Thus, Applicant asserts that by equating a broad phrase such as “analyzes the content of data” to both a semantic and syntactic analysis, the Examiner is either mischaracterizing the teachings of Takahashi or reading out specific claimed limitations, both of which are wholly improper. Accordingly, Takahashi clearly fails to disclose or render obvious (ii) as required above.

Further, the Examiner appears to be equating link object d with a navigation link and embedded objects b and c with inclusion links. Even assuming *arguendo* that link object d is equated to a navigation link, embedded objects b and c are not equivalent to inclusion links. Specifically, as objects b and c do not *point to included components necessary to form a first interactive page* and facilitate display and execution of the included components, it is not possible for objects b and c of Takahashi to be equated with the claimed inclusion links, as required by (i) above. In contrast to the claimed inclusion links, embedded objects b and c are separate files which may be graphics or other types of objects that need to be downloaded/transferred along with the document. That is, embedded objects b and c are not *links that point to other components* that are necessary to form the interactive page. *See* Takahashi, col. 1, ll. 37-40 and col. 2, ll. 4-15.

As further evidence of this, Takahashi clearly states that objects b and c do not need to be transferred, *i.e.*, because objects b and c are unnecessary, if the connection between the client and the server is broken. *See* Takahashi, col. 5, ll. 60-64. That is, the document A (the main document in Takahashi) can be transferred without embedded objects b and c, whereas in the

claimed invention, the interactive page cannot be formed without the components pointed to by the inclusion links in the main file. Accordingly, it is clear that embedded objects b and c in Takahashi do not point to included components that are necessary to form an interactive page. Accordingly, Takahashi also fails to disclose or render obvious (i) as required above.

In view of the above, it is clear that the Examiner's contentions fail to support an obviousness rejection of independent claim 1. Pending dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 7-10

Claims 7 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind and Takahashi, and further in view of US Patent No. 6,886,178 ("Mao").

Claim 8 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind Takahashi, and Mao, and further in view of US Publication No. 2002/0107892 ("Chittu").

Claim 10 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind, Takahashi, Mao, and Chittu, and further in view of US Patent No. 6,230,168 ("Unger").

To the extent that these rejections may still apply to the amended claims, the rejections are respectfully traversed.

As described above, Geshwind and Takahashi fail to disclose or render obvious the limitations of the amended claims. Further, Mao, Chittu, and Unger fail to supply that which Geshwind lacks. Specifically, Mao, Chittu, and Unger are all completely silent with respect to two distinct links, *i.e.*, inclusion links and navigation links as defined by amended claim 1. Further, none of Mao, Chittu, and Unger discloses or renders obvious using semantic and syntactic analysis to identify the inclusion links and navigation links as required by amended claim 1.

In view of the above, it is clear that amended independent claim 1 is patentable over Geshwind, Mao, Chittu, and Unger, whether taken together or separately. Dependent claims 7-10 are patentable for at least the same reasons. Accordingly, withdrawal of these rejections is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/117001).

Dated: April 23, 2010

Respectfully submitted,

By 

Jonathan P. Osha
Registration No.: 33,986
OSHA · LIANG LLP
909 Fannin Street, Suite 3500
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant